

REMARKS

Applicant requests favorable reconsideration and withdrawal of the rejections set forth in the above-mentioned Office Action in view of the foregoing amendments and the following remarks.

Claims 1-19 are now pending in the application, with claims 1 and 19 being independent claims. Claim 1 and 17 have been amended. Support for the amendments can be found throughout the originally-filed disclosure, including, for example, at paragraphs 0047 and 0049 of the specification. Claim 19 is new. Support for the new claim can be found throughout the originally-filed disclosure. Thus, Applicant submits that the amendments and new claim do not include new matter.

Claims 1-17 are rejected in the Office Action under 35 U.S.C. § 102(e) as being anticipated by Saylors et al. (U.S. Patent Application Pub. No. 2004/0111370). Claim 18 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Saylors et al.

Applicant respectfully traverses the rejections. Nevertheless, without conceding the propriety of the rejections, in order to expedite prosecution Applicant has amended independent claim 1 so as to clarify distinctions between the recited invention and Saylors et al. To this end, Applicant submits that the claimed invention is patentably distinguishable from Saylors et al. for at least the following reasons.

Amended independent claim 1 recites a method of encouraging user savings that includes, inter alia, receiving user financial information in a first computer system from a second computer system, wherein the user financial information is received by prompting the user to enter user

savings goal information into the second computer system, and then prompting the user to enter user debt and income information after the user enters the user savings goal information.

Amended independent claim 1 further recites that the first computer system recommends a payment hierarchy using the received financial information, wherein the payment hierarchy includes at least a portion of the user income being allocated to a user savings account and a portion of the user income allocated to user debt. By virtue of these features, embodiments of the claimed invention may encourage a user to increase his or her savings by prompting the user to think of savings first, and further by providing recommendations for aggressive savings. See, e.g., paragraphs 0047, 0049, and 0050 of the specification.

The Office Action cites Saylors et al. as disclosing features of the invention, as previously-claimed, including receiving user financial information and establishing a payment hierarchy using the received financial information. In finding that Saylors et al. discloses these features, the Office Action cites to paragraphs 0070 and 0159 in the reference as teaching that a user provides account names, income sources, and debt information to the system, and paragraphs 0066 and 0072 as teaching the management of funds by a financial institution based on instructions provided by a user. The Office Action further cites paragraph 0069 of Saylors et al. as teaching the receipt of user goal information by disclosing that the user can direct that payments be made in a certain manner in the system.

Assuming, arguendo, that Saylors et al. can be interpreted as set forth in the Office Action, Applicants submit that the reference still cannot be understood to disclose or suggest receiving financial information and recommending a payment hierarchy, as recited in amended

independent claim 1. Nothing in Saylors et al. suggests prompting the user to enter user financial information into the system in a specific order. That is, Saylors et al. does not disclose or suggest prompting the user to enter user savings goal information into a computer system, and then prompting the user to enter user debt information and user income information into a computer system after the user enters the user savings goal information, as recited in amended independent claim 1. Moreover, Applicant submits that Saylors et al., in general, does not provide any suggestion that the disclosed system be configured to encourage user savings vis-à-vis other uses of user income, and, thus, does not provide any suggestion or motivation for one of ordinary skill in the art to consider modifications to the order in which a user provides the system with his or her financial information.

Further, Applicant submits that Saylors et al. does not disclose or suggest that the system be configured to provide a recommended payment hierarchy to a user, as recited in amended independent claim 1. As noted in the Office Action, Saylors et al. appears to indicate that the priority of payments in Saylors et al. is based on a customer's instructions. See, e.g., paragraph 0069. Nothing in Saylors et al. indicates that the system provides any sort of "recommendation" to the customer, prior to receiving the customers instructions, as to the priority of payments.

In sum, Applicant submits that Saylors et al. fails to disclose or suggest multiple features of the claimed invention, including prompting the user to enter financial information into a computer system a specific order and providing recommended payment hierarchy to the user based on the user's financial information. Thus, for at least the foregoing reasons, Applicant

submits that Saylors et al. fails to disclose or suggest the method recited in amended independent claim 1.

With respect to new independent claim 19, Applicant submits that Saylors et al. fails to disclose or suggest the method recited in this claim for at least the same reasons discussed above with respect to independent claim 1.

The dependent claims are patentable for reciting features in addition to those recited in independent claim 1. Individual consideration of the dependent claims is requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration, withdrawal of the outstanding rejections, and passage to issue of the present application.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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